

**UNITED STATES OF AMERICA  
IN THE DISTRICT COURT FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

ERNEST FLAGG, as Next Friend of  
JONATHAN BOND, a minor,

Case No.: 05-CV-74253  
Hon. Gerald Rosen

Plaintiff,

-vs-

CITY OF DETROIT, a municipal corporation;  
DETROIT POLICE CHIEF ELLA BULLY-CUMMINGS;  
DEPUTY DETROIT POLICE CHIEF CARA BEST;  
JOHN DOE POLICE OFFICERS 1 - 20;  
ASST. DEPUTY POLICE CHIEF HAROLD CURETON;  
COMMANDER CRAIG SCHWARTZ;  
POLICE LT. BILLY JACKSON;  
MAYOR KWAME M. KILPATRICK,  
CHRISTINE BEATTY, jointly and severally

Defendants.

NORMAN YATOOMA & ASSOCIATES, P.C.

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**PLAINTIFF'S SECOND SUPPLEMENTAL RULE 26(A) DISCLOSURES**

PLAINTIFF JONATHAN BOND through his Next Friend ERNEST FLAGG ("Plaintiff") by his undersigned counsel, NORMAN YATOOMA & ASSOCIATES, P.C., discloses the following documents and information under Federal Rule of Civil Procedure 26(a) to Defendants:

1. Rule 26(a)(1)(A)(i)-Persons with discoverable information: Except as otherwise indicated, Plaintiff believes that Defendants are in possession of all of the contact information for the following individuals.

A. Lieutenant Michael J. Kearns, Detroit Fire Department, EMS Division – Lt.

Kearns spoke with Tamara Greene the night she was assaulted by Carlita Kilpatrick and witnessed Detroit Police officers taking her statement in the fall of 2002.

B. Lieutenant Walter J. Godzwon, Detroit Fire Department, EMS Division (retired) –

Lt. Godzwon witnessed Defendant Kwame Kilpatrick at Detroit Receiving Hospital; Defendant Kilpatrick was with his EPU officers the night that the officers brought an injured woman into the emergency room in the fall of 2002.

Lt. Godzwon also witnessed EMT Douglas Bayer at the scene.

C. Pastor Kenneth Hampton, Grace Bible Chapel – Pastor Ken Hampton spoke with

Tamara Greene approximately six months before her murder, around the time that

she was assaulted by Carlita Kilpatrick. She told him that she feared for her life and that there were people who wanted to kill her.

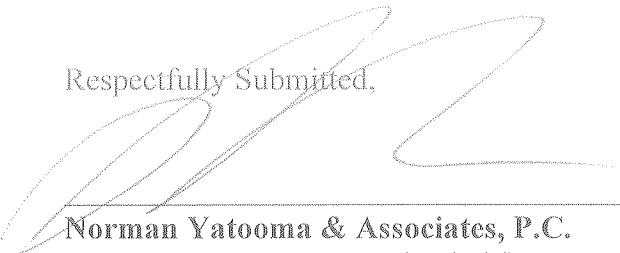
D. Joyce Rogers, Clerk of the Detroit Police Department (retired) – Ms. Rogers recalled seeing the police report of the assault on Tamara Greene by Carlita Kilpatrick, wife of Defendant Kwame Kilpatrick.

2. Rule 26(a)(1)(A)(ii): Documents. Plaintiff Jonathan Bond hereby provides, concurrently with this disclosure (unless previously provided), the following documents to the Defendants:

- A. The Affidavit of Michael J. Kearns;
- B. The Affidavit of Walter J. Godzwon;
- C. The Affidavit of Pastor Kenneth Hampton; and
- D. The Affidavit of Joyce Rogers.

Dated August 11, 2008

Respectfully Submitted,

  
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